

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)	
James D. Roach,)	
)	Case No. 10-41430-659
)	
Debtor.)	Chapter 13
)	
_____)	
)	
Bank of America, N.A.,)	
)	
Creditor)	
)	
v.)	
)	
James D. Roach,)	
)	
Debtor.)	

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW Debtor, James D. Roach, by and through the attorneys of record, *The Bankruptcy Company*, and in Response to the Motion for Relief from Automatic Stay filed by *Bank of America, N.A.*, states as follows:

1. Debtor admits the allegations contained in paragraph number 1 of the Motion.
2. Debtor admits the allegations contained in paragraph number 2 of the Motion.
3. Debtor admits the allegations contained in paragraph number 3 of the Motion.
4. Debtor is unable to admit or deny the allegations contained in paragraph 4 and therefore denies such allegations.
5. Debtor is unable to admit or deny the allegations contained in paragraph 5 and therefore denies such allegations.
6. Debtor is unable to admit or deny the allegations contained in paragraph 6 and therefore denies such allegations.
7. Debtor is unable to admit or deny the allegations contained in paragraph 7 and therefore denies such allegations.
8. Debtor denies the allegations contained in paragraph number 8 of the Motion.
9. Debtor is unable to admit or deny the allegations contained in paragraph 9 and

therefore denies such allegations.

10. Debtor denies the allegations contained in paragraph number 10 of the Motion.
11. Debtor is unable to admit or deny the allegations contained in paragraph 11 and therefore denies such allegations.
12. Debtor is unable to admit or deny the allegations contained in paragraph 12 and therefore denies such allegations.
13. Debtor is unable to admit or deny the allegations contained in paragraph 13 and therefore denies such allegations.
14. Debtor is unable to admit or deny the allegations contained in paragraph 14 and therefore denies such allegations.
15. For further answer, Debtor will provide the full cure prior to the hearing date assigned to this matter, or in the alternative requests to enter into a 6 month stipulation agreement to cure said delinquency.

WHEREFORE Debtor prays this Court enters its order denying the Motion; and for such other relief as may be just and proper.

Respectfully Submitted,
THE BANKRUPTCY COMPANY

/s/ David N. Gunn

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was mailed on this 22nd day of May, 2015 to the following:

/s/ *Jennifer Haven*
Jennifer Haven, Paralegal

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Chapter 13 Trustee

Kozeny & McCubbin, LC
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Counsel for Creditor

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Gray Summit, MO 63039

Debtor